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11 Attorneys for Plaintiff  
12 SUSIE ZAHN

13 **UNITED STATES DISTRICT COURT**  
14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

15 SUSIE ZAHN, individually and as  
16 successor-in-interest to Decedent GARY  
17 OLDHAM,

18 Plaintiff,

19 v.

20 COUNTY OF ALAMEDA, a  
21 municipal corporation; GREGORY J.  
22 AHERN, individually and in his  
23 capacity as Sheriff for the Alameda  
24 County Sheriff's Department; DAVID  
25 LINCOLN, individually and in his  
26 capacity as a Deputy Sheriff for the  
27 Alameda County Sheriff's  
28 Department; JESUS RUBALCAVA-  
GOMEZ, individually and in his  
capacity as a Deputy Sheriff for the  
Alameda County Sheriff's  
Department; and DOES 1-25,  
inclusive, individually, jointly and  
severally,

Defendants.

Case No. 4:17-cv-1107-DMR

**DECLARATION IN SUPPORT OF  
STIPULATED PROTECTIVE ORDER**

The Law Offices of John L. Burris

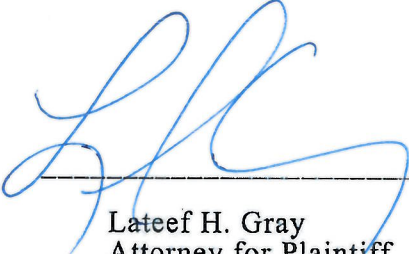
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1 Pursuant to the Court's Standing Order dated June 23, 2017, the parties hereby  
2 declare as follows:

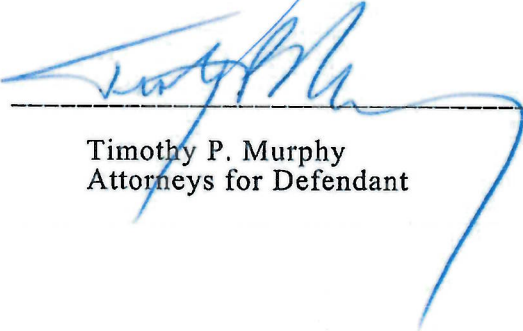
3  
4 1. The stipulated protective order submitted by the parties on August  
5 18, 2017 is identical to the stipulated model protective order for standard  
6 litigation except for the addition of case-identifying information.

7  
8 I declare under penalty of perjury under the laws of the United States that the foregoing is  
9 true and correct.

10  
11  
12 DATED: 08/22/2017

  
Lateef H. Gray  
Attorney for Plaintiff

13  
14  
15  
16 DATED: 8-22-2017

  
Timothy P. Murphy  
Attorneys for Defendant